

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA
Title III
No. 17 BK 3283-LTS
(Jointly Administered)

**NOTICE OF (A) ADJOURNMENT AS TO CLAIMS LISTED IN SCHEDULE B AND (B)
SUBMISSION OF AMENDED SCHEDULES FOR THE ONE HUNDRED THIRTY-
EIGHT OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE
COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF
THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO**

To the Honorable United States District Judge Laura Taylor Swain:

1. Pursuant to notice, scheduled for hearing on March 4, 2020 (the “March Hearing”) were various objections to proofs of claim filed against the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System for the Government of the Commonwealth of Puerto Rico (“ERS,” and together with HTA and the Commonwealth, the “Debtors”).

2. At the March Hearing, the Court heard and granted the *One-Hundred Thirty-Eighth*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System for the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based Upon Unspecified Puerto Rico Statutes (the “One Hundred Thirty-Eighth Omnibus Objection”), solely with respect to claims as to which the claimant had neither filed a response nor submitted a supplemental mailing. In order to review the responses filed and supplemental mailings received by certain claimants, and in particular, to evaluate whether such claimants shall be transferred into the administrative reconciliation process, the Debtors, by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as representative of the Commonwealth, HTA, and ERS pursuant to Section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”),² adjourn the hearing on the One Hundred Thirty-Eighth Omnibus Objection to the April 22, 2020 omnibus hearing (the “April Hearing”), solely with respect to the claims identified on **Schedule B** hereto.

3. The Debtors respectfully submit as Attachment 1 hereto a revised proposed order on the One Hundred Thirty-Eighth Omnibus Objection, and accompanying amended schedules of claims to be disallowed and claims subject to adjournment.

Dated: March 13, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer
Hermann D. Bauer
USDC No. 215205
Carla García Benítez
USDC No. 203708
Daniel J. Perez-Refojos
USDC No. 303909
O’NEILL & BORGES LLC
250 Muñoz Rivera Ave., Suite 800

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

San Juan, PR 00918-1813
Tel: (787) 764-8181
Fax: (787) 753-8944

Attorneys for the Financial Oversight and Management Board for Puerto Rico, as representative for the Commonwealth, HTA, and ERS

/s/ Martin J. Bienenstock
Martin J. Bienenstock (*pro hac vice*)
Brian S. Rosen (*pro hac vice*)
PROSKAUER ROSE LLP
Eleven Times Square
New York, NY 10036
Tel: (212) 969-3000
Fax: (212) 969-2900

Co-Attorneys for the Financial Oversight and Management Board for the Puerto Rico, as representative for the Commonwealth, HTA, and ERS